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By ECF

March 12, 2024

The Honorable Richard M. Gergel
United States District Court
for the District of South Carolina
P.O. Box 835
Charleston, South Carolina 29402

Re: *Tyco Fire Products LP v. AIU Ins. Co., et al.*, Civ. No. 2:23-2384 (D.S.C.)

Dear Judge Gergel:

Further to the Court's Scheduling Order dated October 30, 2023 (ECF 111), we write jointly on behalf of (1) Tyco Fire Products LP ("Tyco") and (2) Zurich American Insurance Company ("ZAIC") in its capacity as successor-in-interest to certain underwriting companies, including but not limited to Zurich Insurance Company, U.S. Branch, to inform the Court that Tyco and ZAIC have reached a settlement-in-principle.¹ This settlement-in-principle must be finalized through a formal written agreement, which Tyco and ZAIC expect to finalize expeditiously.

As a result of their settlement-in-principle, Tyco and ZAIC agree that their respective discovery obligations in respect to one another in this action shall be suspended while they work to finalize their settlement agreement.

In the event that Tyco and ZAIC are unable to finalize their written settlement agreement, they will jointly and promptly report to the Court with a further update and proposed course of action.

Respectfully submitted,

/s/ Allan B. Moore

Allan B. Moore

cc Counsel for All Parties (via ECF)

¹ ZAIC is responsible for Policy No. 89 35 351 and a certain other policy allegedly issued in 1979.